

1 BROWN RUDNICK LLP
2 David J. Molton (SBN 262075)
(DMolton@brownrudnick.com)
3 Seven Times Square
4 New York, New York 10036
Telephone: (212) 209-4800
Facsimile: (212) 209-4801

5 BROWN RUDNICK LLP
6 Joel S. Miliband (SBN 077438)
(JMiliband@brownrudnick.com)
7 2211 Michelson Drive, Seventh Floor
Irvine, California 92612
Telephone: (949) 752-7100
8 Facsimile: (949) 252-1514

9 | *Attorneys for Fire Victim Trustee*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

14 | In re:

15 | PG&E CORPORATION.

- and -

17 | PACIFIC GAS AND ELECTRIC COMPANY,
18 | Debtors.

- 19 Affects PG&E Corporation
20 Affects Pacific Gas and Electric Company
 Affects both Debtors

* All papers shall be filed in the Lead Case, No. 19-30088 (DM).

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**FIRE VICTIM TRUSTEE'S
STATEMENT OF NON-
OPPOSITION TO LETTER
REQUEST OF JASON PARKER**

[Relates to Docket Number 14035]

1 Cathy Yanni, in her capacity as the Trustee (the “**Trustee**”) of the Fire Victim Trust (the
2 “**Trust**”), by and through her undersigned counsel, respectfully states as follows:

3 1. On January 29, 2019, PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and
4 Electric Company (“**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the
5 “**Debtors**”), commenced with the Court voluntary cases under chapter 11 of the Bankruptcy Code
6 (the “**Chapter 11 Cases**”). The Reorganized Debtors filed the Chapter 11 Cases to address the
7 billions of dollars of damage and loss relating to the devastating 2015, 2017 and 2018 California
8 fires and to provide compensation to wildfire victims.

9 2. By Order dated July 1, 2019, the Court established October 21, 2019 (the “**Bar**
10 **Date**”) as the last date to file proofs of claim in the Chapter 11 Cases [Docket No. 2806]. By Order
11 dated November 11, 2019, the Court extended the Bar Date to December 31, 2019 (the “**Extended**
12 **Bar Date**”) for unfiled, non-governmental Fire Claimants [Docket No. 4672].

13 3. By Order dated June 20, 2020 [Docket No. 8053] the Bankruptcy Court confirmed
14 the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June*
15 *19, 2020* (as may be further modified, amended or supplemented from time to time, and together
16 with any exhibits or scheduled thereto, the “**Plan**”). The Effective Date of the Plan occurred on
17 July 1, 2020. *See* Dkt. No. 8252.

18 4. Pursuant to the Plan, the Trustee was appointed as the representative of each of the
19 Debtors’ estates pursuant to sections 1123(a)(5), (a)(7), and (b)(3)(B) of the Bankruptcy Code was
20 vested with the authority and power (subject to the Fire Victim Trust Agreement¹ and the Plan) to,
21 among other things: (i) administer, object to or settle Fire Victim Claims; (ii) make distributions to
22 holders of Fire Victim Claims in accordance with the terms of the Plan and the Fire Victim Trust
23 Agreement, and (iii) carry out the provisions of the Plan related to the Trust and the Fire Victim
24 Claims. *See* Plan § 6.8(b).

25 ///

26 _____
27 ¹ Capitalized terms used but not otherwise herein defined have the meanings ascribed to such terms
in the Plan.
28

1 5. Also pursuant to the Plan, all Fire Victim Claims were channeled to the Trust on the
2 Effective Date and are subject to the Channeling Injunction, and any liabilities of the Debtors or the
3 Reorganized Debtors, as applicable, for any Fire Victim Claims have been fully assumed by, and
4 are the sole responsibility of, the Trust, and shall be satisfied solely from the assets of the Trust.
5 *See* Plan §§ 4.7(a), 4.26(c), 6.7(a).

6 6. To be eligible for compensation from the Trust a holder of a Fire Victim Claim must
7 have timely filed a proof of claim. *See* Dkt. No. 8057-1.

8 7. On March 4, 2020, Jason Parker filed proof of claim number 97098 (the “**Proof of**
9 **Claim**”). No other proof of claim for Mr. Parker has been channeled to the Trust.

10 8. On January 28, 2021, Mr. Parker timely submitted a Claims Questionnaire to the
11 Trust.

12 9. On August 1, 2022 the Trust sent an email (the “**Late Claim Email**”) to all
13 claimants, including Mr. Parker, who had submitted Claims Questionnaires to the Trust based on
14 proofs of claims filed after the Extended Bar Date. The Late Claim Email informed these claimants
15 that their proofs of claim would need to be deemed timely filed by the Bankruptcy Court in order
16 for their Fire Victim Claims to be eligible for compensation by the Trust.

17 10. On September 28, 2023, Mr. Parker filed a letter with the Court seeking to have the
18 Proof of Claim deemed timely [Docket No. 14035] (the “**Late Claim Letter**”).

19 11. Given Mr. Parker’s engagement with the Trust and the status of his claims within
20 the Trust’s claims administration process, the Trustee does not object to this Court deeming the
21 Proof of Claim timely for the purpose of administration by the Trust.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 12. Nothing herein is intended to, nor shall it be construed to be, a waiver by the Fire
2 Victim Trust, or any other party in interest of any right to object to the Proof of Claim on any
3 grounds other than the untimely filing thereof.

4

5 DATED: October 11, 2023

BROWN RUDNICK LLP

6 By: /s/ David J. Molton

7 David J. Molton (SBN 262075)
8 (DMolton@brownrudnick.com)
9 Seven Times Square
10 New York, New York 10036
11 Telephone: (212) 209-4800
12 Facsimile: (212) 209-4801

13 and

14 Joel S. Miliband (SBN 077438)
15 (JMiliband@brownrudnick.com)
16 2211 Michelson Drive
17 Seventh Floor
18 Irvine, California 92612
19 Telephone: (949) 752-7100
20 Facsimile: (949) 252-1514

21 *Attorneys for Fire Victim Trustee*